

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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**GREGORY BOYER**, as Administrator of the  
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Lead Case No. 20-CV-1123

**ADVANCED CORRECTIONAL  
HEALTHCARE, INC., et al.,**

Defendants.

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**GREGORY BOYER**, as Administrator of the  
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Case No. 22-CV-723

**USA MEDICAL & PSYCHOLOGICAL  
STAFFING, S.C., et al.,**

Defendants.

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**DEFENDANTS' PROPOSED SPECIAL VERDICT**

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Defendants Advanced Correctional Healthcare, Inc., USA Medical & Psychological Staffing, S.C., Lisa Pisney and Amber Fennigkoh, by and through their attorneys Leib Knott Gaynor LLC, submit the following Special Verdict Form to be used at trial.

Dated this 1st day of August, 2025.

**LEIB KNOTT GAYNOR LLC**

By: /s/ Douglas S. Knott  
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**SPECIAL VERDICT - LIABILITY**

We, the jury, unanimously find the following by a preponderance of the evidence:

**QUESTION NO. 1:** Was Amber Fennigkoh, R.N., negligent with regard to her care and treatment of Christine Boyer on December 22, 2019?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered Question No. 1 “Yes” then answer Question No. 2. Otherwise, proceed to answer Question No. 3.**

**QUESTION NO. 2:** Was Amber Fennigkoh’s negligence a cause of injury to Christine Boyer?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Answer this question regardless of how you have answered other questions.**

**QUESTION NO. 3:** Was Lisa Pisney, N.P., negligent with regard to her care and treatment of Christine Boyer on December 22, 2019?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered Question No. 3 “Yes” then answer Question No. 4. If you answered “No” to Question No. 3, please sign, date and return this verdict form.**

**QUESTION NO. 4:** Was Lisa Pisney’s negligence a cause of injury to Christine Boyer?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Answer the following questions only if you have answered “Yes” to Question No. 4. If you answered “No” to Question Nos. 3 or 4, please sign, date and return this verdict form.**

**QUESTION NO. 5:** Was Ms. Boyer at a high degree of risk of serious harm if she did not receive additional medical attention the afternoon and evening of Sunday, December 22, 2019?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Answer this question regardless of how you answered Question No. 5.**

**QUESTION NO. 6:** Did Lisa Pisney fail to take reasonable available actions to provide Christine Boyer medical attention the afternoon and evening of Sunday, December 22, 2019?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered Question No. 6 “Yes” then answer Question No. 7. If you answered “No” to Question No. 6, please sign, date and return this verdict form.**

**QUESTION NO. 7:** Was Lisa Pisney’s failure to take additional reasonable available actions unreasonable?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered Question No. 7 “Yes” then answer Question No. 8. If you answered “No” to Question No. 7, please sign, date and return this verdict form.**

**QUESTION NO. 8:** Was Lisa Pisney’s unreasonable failure to take additional available actions a cause of additional injury to Christine Boyer?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Regardless of how you answered prior questions, please sign, date and return this verdict form.**

**SO SAY WE ALL, this \_\_\_\_ day of October, 2025.**

\_\_\_\_\_  
Foreperson

**SPECIAL VERDICT - DAMAGES**

We, the jury, unanimously find the following by a preponderance of the evidence:

**QUESTION NO. 1:** Please state the amount that will fairly compensate Christine Boyer for conscious pain and suffering experienced as a result of any act or omission of [Amber Fennigkoh or Lisa Pisney]?

Yes \_\_\_\_\_ No \_\_\_\_\_

[To be answered only if the jury finds Pisney or Fennigkoh negligent.]

**QUESTION NO. 2:** Please state the amount that will fairly compensate Gregory Boyer for his loss of society and companionship of Christine Boyer?

Yes \_\_\_\_\_ No \_\_\_\_\_

**SO SAY WE ALL, this \_\_\_\_ day of October, 2025.**

\_\_\_\_\_  
Foreperson